

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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COUNTY OF SUFFOLK, NEW YORK

ANSWER TO
COUNTERCLAIMS

Plaintiff,

-against-

GEORGE R. SIMPSON, JEAN SIMPSON,
CHARLOTTE SIMPSON, OFFICE
MANAGEMENT SYSTEMS CORP. and
SUFFOLK RESEARCH SERVICE, INC.,

CV-07-01644
Seybert, J.
Orenstein, M.J.

Defendants.
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Plaintiff, County of Suffolk, New York, by its attorney, CHRISTINE MALAFI, Suffolk County Attorney, as and for its Answer to the counterclaims of the defendants, George R. Simpson and Jean Simpson, alleges upon information and belief as follows:

1. The allegations contained in paragraphs numbered "41", "42", "43", "45", "46", "47", "48", "49" and "50" of the Answer and Counterclaim characterize the legal action being brought and purport to invoke the jurisdiction of the Court pursuant to the enumerated statutes and, as such, the Respondent County makes no answer save to demand strict proof thereof and to deny any conduct giving rise to any cause of action thereunder, leaving all questions of law to be determined by the Court..

2. Denies the allegations contained in paragraphs numbered "44", "51" and "52" of the Answer and Counterclaim.

AS AND FOR PLAINTIFF, COUNTY OF SUFFOLK, NEW YORK 'S, ANSWERS TO THE
DEFENDANTS' FIRST COUNTERCLAIM

3. Answering paragraph numbered "53" of the Answer and Counterclaim, the Plaintiff, COUNTY OF SUFFOLK, NEW YORK, repeats, reiterates and realleges each and

every admission and denial to the paragraphs numbered “42” through “52” inclusive, with the same force and effect as if the same were set forth at length herein.

4. Denies the allegations contained in paragraph numbered “54” of the Answer and Counterclaim.

AS AND FOR PLAINTIFF, COUNTY OF SUFFOLK, NEW YORK 'S, ANSWERS TO THE
DEFENDANTS' SECOND COUNTERCLAIM

5. Answering paragraph numbered “55” of the Answer and Counterclaim, the Plaintiff, COUNTY OF SUFFOLK, NEW YORK, repeats, reiterates and realleges each and every admission and denial to the paragraphs numbered “42” through “54” inclusive, with the same force and effect as if the same were set forth at length herein.

6. Denies the allegations contained in paragraphs numbered “56”, “57” and “58” of the Answer and Counterclaim.

AS AND FOR PLAINTIFF, COUNTY OF SUFFOLK, NEW YORK 'S, ANSWERS TO THE
DEFENDANTS' THIRD COUNTERCLAIM

7. Answering paragraph numbered “59” of the Answer and Counterclaim, the Plaintiff, COUNTY OF SUFFOLK, NEW YORK, repeats, reiterates and realleges each and every admission and denial to the paragraphs numbered “42” through “58” inclusive, with the same force and effect as if the same were set forth at length herein.

8. Denies the allegations contained in paragraphs numbered “60” and “61” of the Answer and Counterclaim.

WHEREFORE, Plaintiff, COUNTY OF SUFFOLK, NEW YORK, respectfully requests that this Court enter Judgment dismissing the within Counterclaims, together with costs,

disbursements, attorneys' fees and such other and further relief as to this Court may seem just and proper.

Dated: Hauppauge, New York
May 1, 2008

Yours, etc.

CHRISTINE MALAFI
Suffolk County Attorney
Attorney for County Respondents
H. Lee Dennison Building
100 Veterans Memorial Highway
P.O. Box 6100
Hauppauge, New York 11788-0099
(631) 853-4851

s/ Leonard G. Kapsalis

By:

Leonard G. Kapsalis (LGK 5852)
Assistant County Attorney

To: George R. Simpson
Jean Simpson
P.O. Box 775
Hampton Bays, NY 11946

) SS.:

with th

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Cathleen D. Moreira

15 day of May, 2008

L. Adriana Lopez
Notary Public, State of New York
Cert No. 02L06145268
Qualified in Suffolk County
Commission Expires May 1, 2010